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10 UNITED STATES DISTRICT COURT  
11 WESTERN DISTRICT OF WASHINGTON

12 BOARD OF TRUSTEES OF THE  
13 EMPLOYEE PAINTERS' TRUST; BOARD  
14 OF TRUSTEES OF THE WESTERN  
15 WASHINGTON PAINTERS DEFINED  
16 CONTRIBUTION PENSION TRUST; BOARD  
17 OF TRUSTEES OF THE DISTRICT  
18 COUNCIL NO. 5 APPRENTICESHIP AND  
19 TRAINING TRUST FUND; BOARD OF  
20 TRUSTEES OF THE INTERNATIONAL  
21 PAINTERS AND ALLIED TRADES  
INDUSTRY PENSION FUND; BOARD OF  
TRUSTEES OF THE FINISHING TRADES  
INSTITUTE; BOARD OF TRUSTEES OF  
THE PAINTERS AND ALLIED TRADES  
LABOR MANAGEMENT COOPERATION  
INITIATIVE; WESTERN WASHINGTON  
SIGNATORY PAINTING EMPLOYERS  
ASSOCIATION; and INTERNATIONAL  
UNION OF PAINTERS AND ALLIED  
TRADES DISTRICT COUNCIL NO. 5,

22 Plaintiffs,

23 v.

24 CHAMPION PAINTING SPECIALTY  
25 SERVICES CORP, a Florida corporation;  
CARLOS HERNANDEZ, an individual;  
BERKSHIRE HATHAWAY SPECIALTY  
INSURANCE COMPANY, a Nebraska

NO. 2:21-cv-00858-MJP

STIPULATION TO EXTEND TIME IN  
WHICH TO ANSWER AND ORDER

NOTED ON MOTION CALENDAR:  
November 2, 2012 (Local Rule 7(d)(1))

**STIPULATION TO EXTEND TIME IN WHICH TO ANSWER  
AND ORDER – Page 1**

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601 Union Street, Suite 4100  
Seattle, Washington 98101-2380  
(206) 628-6600

1 corporation; OLD REPUBLIC SURETY  
 2 COMPANY, a Wisconsin corporation;  
 3 LIBERTY MUTUAL INSURANCE  
 4 COMPANY, a Massachusetts corporation;  
 WASHINGTON STATE DEPARTMENT OF  
 TRANSPORTATION, a political subdivision of  
 the State of Washington; ROGNLINS, INC., a  
 Washington corporation; DOES & ROES I-X,

5 Defendants.  
 6

7 Plaintiffs by and through their counsel, Christensen James & Martin, and Defendant  
 8 Old Republic Surety Company submit this Stipulation to Extend the Time Within Which to  
 9 Answer.

10 The parties are attempting to resolve certain matters in which may narrow or eliminate  
 11 issues to the pending litigation. Therefore, the parties agree that it would be appropriate to  
 12 extend the time within which Defendant Old Republic Surety Company have to answer the  
 13 Complaint through November 19, 2021.

14 This is the first request by the parties to extend the time for Defendant Old Republic  
 15 Surety Company to answer the Complaint.

16 Dated: November 2, 2021

Dated: November 2, 2021

17 CHRISTENSEN JAMES & MARTIN

18  
 19 By: /s/ Wesley J. Smtih  
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 pfriedrich@williamskastner.com  
 Counsel for Defendant  
 Old Republic Surety Company

1                           **IT IS SO ORDERED**  
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Dated: November 2, 2021



United States District Court Judge